

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

FRANK BULACHER.,

Plaintiff,

v.

ENOWA, LLC, ENOWA CONSULTING
GmbH, WINFRIED S. HESEL, and
ALI SARRAF,

Defendants.

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CIVIL ACTION NO.
3:10-CV-00156-M

**DEFENDANTS' ORIGINAL ANSWER TO
PLAINTIFF'S FIRST AMENDED COMPLAINT**

Defendants Enowa, L.L.C. ("Enowa"), Enowa Consulting GmbH ("Enowa GmbH"), Winfried S. Hesel ("Hesel") and Ali Sarraf ("Sarraf") (collectively "Defendants") file the following original answer to the first amended complaint filed by Plaintiff Frank Bulacher ("Bulacher") on February 25, 2010 (Docket No. 6), and state as follows.

I.

ANSWER

1. Defendants admit the first sentence but deny the remaining allegations in paragraph 1 of Bulacher's complaint.

2. Defendants admit the first two sentences but deny the remaining allegations in paragraph 2 of Bulacher's complaint.

3. Defendants admit the first sentence but deny the remaining allegations in paragraph 3 of Bulacher's complaint.

4. Defendants deny the allegations in paragraph 4 of Bulacher's complaint.

5. Defendants admit Bulacher was terminated but deny the remaining allegations in paragraph 5 of Bulacher's complaint.

6. Defendants deny the allegations in paragraph 6 of Bulacher's complaint.

7. Defendants incorporate by reference each and every response contained in paragraphs 1 through 6 of this original answer. Defendants are not required to admit or deny the truth of the remaining allegations in paragraph 7 of Bulacher's complaint.

8. Defendants deny the allegations in paragraph 8 of Bulacher's complaint.

9. Defendants incorporate by reference each and every response contained in paragraphs 1 through 8 of this original answer. Defendants are not required to admit or deny the truth of the remaining allegations in paragraph 9 of Bulacher's complaint.

10. Defendants deny the allegations in paragraph 10 of Bulacher's complaint.

11. Defendants incorporate by reference each and every response contained in paragraphs 1 through 10 of this original answer. Defendants are not required to admit or deny the truth of the remaining allegations in paragraph 11 of Bulacher's complaint.

12. Defendants deny the allegations in paragraph 12 of Bulacher's complaint.

13. Defendants incorporate by reference each and every response contained in paragraphs 1 through 12 of this original answer. Defendants are not required to admit or deny the truth of the remaining allegations in paragraph 13 of Bulacher's complaint.

14. Defendants deny the allegations in paragraph 14 of Bulacher's complaint and deny that Bulacher is entitled to any relief requested in paragraph 14 of Bulacher's complaint.

15. Defendants deny the allegations in paragraph 15 of Bulacher's complaint and deny that Bulacher is entitled to any relief requested in paragraph 15 of Bulacher's complaint.

16. Defendants deny the allegations in paragraph 16 of Bulacher's complaint and deny that Bulacher is entitled to any relief requested in paragraph 16 of Bulacher's complaint.

17. Defendants are not required to admit or deny the truth of the allegations in paragraph 17 of Bulacher's complaint

18. Defendants deny that Bulacher is entitled to any relief requested in his prayer for relief.

II.

PRAYER FOR RELIEF

Based upon the foregoing, Defendants request that Bulacher takes nothing by way of his suit, that Defendants be awarded all costs incurred herein, and that Defendants be awarded such other and further relief, at law and in equity, to which they may be justly entitled.

Respectfully submitted,

/s/ Eric C. Wood

Richard J. Wallace, III
State Bar No. 24008224
Eric C. Wood
State Bar No. 24037737

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ALI SARRAF

CERTIFICATE OF SERVICE

I hereby certify that on March 9, 2010, a true and correct copy of the foregoing document has been sent to the following counsel of record by electronic mail through ECF filing in accordance with the Federal Rules of Civil Procedure and the local rules of the Northern District of Texas.

Mark H. How
Mark Frels
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WOODS & DUKE, P.C.
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/s/ Eric C. Wood
Eric C. Wood

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